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The use of Gaussian functions to describe chromatographic elution curves is widespread. However, some elution curves are highly asymmetric. In cases where the sample peak is followed by a contaminant that has a leading edge that rises sharply but the curve then tails off, it may be possible to define an effective width for $t_{\rm c}$ as "twice the distance from the leading edge to a perpendicular line through the maxim of the contaminant curve, measured along a perpendicular bisection of that line."

Procedure 2—Procedure for Field Auditing GC Analysis

Responsibilities of audit supervisor and analyst at the source sampling site include the following:

- A. The audit supervisor verifies that audit cylinders are stored in a safe location both before and after the audit to prevent vandalism.
- B. At the beginning and conclusion of the audit, the analyst records each cylinder number and pressure. An audit cylinder is never analyzed when the pressure drops below 200 psi.
- C. During the audit, the analyst performs a minimum of two consecutive analyses of each audit cylinder gas. The audit must be conducted to coincide with the analysis of source test samples, normally immediately after GC calibration and prior to sample analyses.
- D. At the end of audit analyses, the audit supervisor requests the calculated concentrations from the analyst and compares the results with the actual audit concentrations. If each measured concentration agrees with the respective actual concentration within ±10 percent, he directs the analyst to begin analyzing source samples. Audit supervisor judgment and/or supervisory policy determine action when agreement is not within ±10 percent. When a consistent bias in excess of 10 percent is found, it may be possible to proceed with the sample analysis, with a corrective factor to be applied to the results at a later time. However, every attempt should be made to locate the cause of the discrepancy, as it may be misleading. The audit supervisor records each cylinder number, cylinder pressure (at the end of the audit), and all calculated concentrations. The individual being audited must not under any circumstance be told actual audit concentrations until calculated concentrations have been submitted to the audit supervisor.

FIELD AUDIT REPORT

 $Part\ A-$ To be filled out by organization supplying audit cylinders.

1. Organization supplying audit sample(s) and shipping address

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Audit s ne number	supervisor,	or	ganizat	ion,	and
Shipping ention	instructio	ns:	Name,	Add	ress,

- 4. Guaranteed arrival date for cylinders
- 5. Planned shipping date for cylinders
- 6. Details on audit cylinders from last analysis

	Low conc.	High conc.
a. Date of last analysis b. Cylinder number c. Cylinder pressure, psi d. Audit gas(es)/balance gas e. Audit gas(es), ppm f. Cylinder construction		

Part B—To be filled out by audit supervisor.

- 1. Process sampled
- 2. Audit location
- 3. Name of individual audit
- 4. Audit date
 - 5. Audit results:

	Low conc. cyl- inder	High conc. cyl- inder
a. Cylinder number b. Cylinder pressure before audit, psi c. Cylinder pressure after audit, psi d. Measured concentration, ppm Injection #1* Injection #2* Average e. Actual audit concentration, ppm (Part A, 6e) f. Audit accuracy:1 Low Conc. Cylinder High Conc. Cylinder Percent¹ accuracy=		
Measured Conc. – Actual Conc. Actual Conc. ×100		
g. Problems detected (if any)		

¹ Results of two consecutive injections that meet the sample analysis criteria of the test method.

[47 FR 39178, Sept. 7, 1982]

APPENDIX D TO PART 61—METHODS FOR ESTIMATING RADIONUCLIDE EMISSIONS

1. Purpose and Background

Facility owners or operators may estimate radionuclide emissions to the atmosphere for dose calculations instead of measuring emissions. Particulate emissions from mill tailings piles should be estimated using the procedures listed in reference re #2. All other emissions may be estimated by using the

Environmental Protection Agency

"Procedures" listed below, or using the method described in reference #1.

2. Procedure

To estimate emissions to the atmosphere:

(a) Determine the amount (in curies) used at facilities for the period under consideration. Radioactive materials in sealed packages that remain unopened, and have not leaked during the assessment period should not be included in the calculation.

(b) Multiply the amount used by the following factors which depend on the physical state of the radionuclide. They are:

- (i) 1 for gases;
- (ii) 10^{-3} for liquids or particulate solids; and
- (iii) 10^{-6} for solids.

If any nuclide is heated to a temperature of 100 degrees Celsius or more, boils at a temperature of 100 degrees Celsius or less, or is intentionally dispersed into the environment, it must be considered to be a gas.

(c) If a control device is installed between the place of use and the point of release, multiply emissions from (b) by an adjustment factor. These are presented in Table 1.

Controls	Types of radio- nuclides controlled	Adjustment factor to emissions	Comments and conditions
HEPA filters	Particulates	0.01	Not applicable to gaseous radionuclides; periodic testing is prudent to ensure high removal efficiency.
Fabric filter	Particulates	0.1	Monitoring would be prudent to guard against tears in filter.
Sintered metal	Particulates	1	Insufficient data to make recommendation.
Activated carbon filters	lodine gas	0.1	Efficiency is time dependent; monitoring is nec- essary to ensure effectiveness.
Douglas bags: Held one week or longer for decay.	Xenon	0.5/wk	Based on xenon half-life of 5.3 days;
Douglas bags: Released within one week.	Xenon	1	Provides no reduction of exposure to general public.
Venturi scrubbers	Particulates	0.05	Although venturis may remove gases, variability in gaseous removal efficiency dictates adjustment factor for particulates only.
Packed bed scrubbers	Gases	0.1	Not applicable to particulates.
Electrostatic precipitators	Particulates	0.05	Not applicable for gaseous radionuclides
Xenon traps	Xenon	0.1	Efficiency is time dependent; monitoring is nec- essary to ensure effectiveness.
Fume hoods	All	1	Provides no reduction to general public exposures.
Vent stacks	All	1	Generally provides no reduction of exposure to general public.

References

(1) Environmental Protection Agency, "A Guide for Determining Compliance with the Clean Air Act Standards for Radionuclides Emissions from NRC-Licensed and Non-DOE Federal Facilities", EPA 520/1–89–002, January 1989.

(2) Nuclear Regulatory Commission, "Methods for Estimating Radioactive and Toxic Airborne Source Terms for Uranium Milling Operations", U.S. Nuclear Regulatory Commission Regulatory Guide 3.59, March 1987.

[54 FR 51711, Dec. 15, 1989]

APPENDIX E TO PART 61—COMPLIANCE PROCEDURES METHODS FOR DETER-MINING COMPLIANCE WITH SUBPART I

1. Purpose and Background

This Appendix provides simplified procedures to reduce the burden on Nuclear Regulatory Commission (NRC) licensees, and non-Department of Energy Federal facilities in determining compliance with 40 CFR part 61, subpart I. The procedures consist of a series of increasingly more stringent steps, depending on the facility's potential to exceed the standard.

First, a facility can be found in compliance if the quantity of radioactive material possessed during the year is less than that listed in a table of annual possession quantities. A facility will also be in compliance if the average annual radionuclide emission concentration is less than that listed in a table of air concentration levels. If the facility is